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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
DEVELOPMENT, LLC, a Delaware Limited
Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
TIMESHARE EXIT TEAM, a Washington
Limited Liability Company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual and
citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE REPLY IN SUPPORT OF MOTION
TO COMPEL [ECF #284]**

[First Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Reed Hein & Associates d/b/a/ Timeshare Exit Team (“Defendant”) hereby stipulate to extend Plaintiff’s deadline to file a Reply in support of Plaintiff’s Motion to Compel [ECF #284] (the “Motion”), currently set for September 18, 2020, until October 2, 2020, and as grounds state as follows:

1. Plaintiff filed the Motion on August 19, 2020.
2. Defendant filed its Opposition on September 11, 2020, after a brief extension to its response deadline.
3. Counsel for Plaintiff is concurrently in the process of drafting its Reply in Support of its Motion to Overrule SGB’s Privilege Claims, which is a fundamental issue in this litigation.
4. Additionally, Defendant’s Opposition raises several points related to documents that have been produced, but have not been specifically identified by bates reference. Counsel for Defendant has agreed to provide Plaintiff with specific references to the relevant production, however this will not be available prior to the current filing deadline.
5. In order to adequately respond to Defendant’s Opposition, and the issues presented therein, the Parties agree that Plaintiff’s deadline to file its Reply in support of the Motion be extended two (2) weeks, up to and including October 2, 2020

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6. This is the Parties' first request for extension of this deadline, and it is not intended to cause any delay or prejudice to any party. Defendant does not object to the requested extension.

Dated this 17th day of September, 2020

GREENSPOON MARDER, LLP

**GORDON REES SCULLY
MANSUKHANI, LLP**

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Reed Hein & Associates, LLC dba Timeshare
Exit Team, Brandon Reed, Trevor Hein,
Thomas Parenteau, and Happy Hour Media
Group, LLC*

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: 9-18-2020

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 17th day of September 2020. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri
An employee of Greenspoon Marder LLP

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